

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JESSICA MOORE, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

GERBER PRODUCTS COMPANY  
(d/b/a Nestlé Nutrition, Nestlé Infant  
Nutrition, or Nestlé Nutrition North  
America),

Defendant.

CASE NO.: 2:21-cv-02516-CCC-MF

**Hon. Claire C. Cecchi**

**Motion Return Date: April 19, 2021**

**DECLARATION OF GLENN T. GRAHAM**

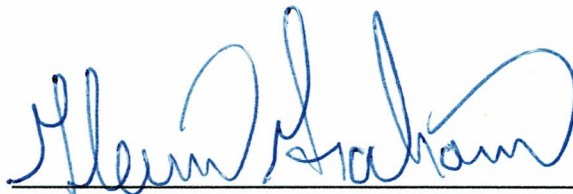
I, Glenn T. Graham, hereby declare and state, as follows:

1. I am a member of the Bars of the States of New Jersey and New York, and am special counsel with the law firm of Kelley Drye & Warren LLP. I submit this declaration in support of Gerber® Products Company's ("Gerber") Memorandum of Law In Opposition To Plaintiff Jessica Moore's Cross-Motion To Transfer All Gerber Claims To The Eastern District of Virginia.

2. Attached hereto as **Exhibit A** is a March 12, 2021 cover email from Plaintiffs' counsel in *Shepard v. Gerber Products Company*, No. 2:21-cv-01977-CC-MF (D.N.J.) (the "*Shepard* Action") forwarding the *Shepard* Action Plaintiffs' Motion to Consolidate to counsel for the plaintiffs in *Wallace v. Gerber Products Company*, No. 2:21-cv-02531 (D.N.J.); *Moore v. Gerber Products Company*, No. 2:21-cv-02516 (D.N.J.); *Cantor v. Gerber Products Company*, No. 2:21-cv-03402 (D.N.J.); and *Pierre-Louis v. Gerber Products Company*, No. 2:21-cv-04791 (D.N.J.).

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on April 5, 2021.

  
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GLENN T. GRAHAM